

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1. STATE OF OKLAHOMA, ex rel.)
W.A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL OF)
THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the TRUSTEE FOR)
NATURAL RESOURCES FOR THE)
STATE OF OKLAHOMA,)

Plaintiff,)

v.)

Case No. 4:05-cv-00329-JOE-SAJ

1. TYSON FOODS, INC.,)
2. TYSON POULTRY, INC.,)
3. TYSON CHICKEN, INC.,)
4. COBB-VANTRESS, INC.,)
5. AVIAGEN, INC.,)
6. CAL-MAINE FOODS, INC.,)
7. CAL-MAINE FARMS, INC.,)
8. CARGILL, INC.,)
9. CARGILL TURKEY)
 PRODUCTION, LLC,)
10. GEORGE'S, INC.,)
11. GEORGE'S FARMS, INC.,)
12. PETERSON FARMS, INC.,)
13. SIMMONS FOODS, INC., and)
14. WILLOW BROOK FOODS, INC.,)

Defendants.)

**MOTION BY THE STATE OF OKLAHOMA'S COUNSEL TO ADMIT
CO-COUNSEL *PRO HAC VICE***

COMES NOW Richard T. Garren, counsel of record for Plaintiff, The State of Oklahoma, and pursuant to LCvR 83.3(J) hereby moves for the admission *pro hac vice* of South Carolina attorney Elizabeth Claire Xidis, who will serve as co-counsel for the aforementioned Plaintiff if so admitted.

If this motion is granted by the Court, the undersigned Richard T. Garren and his law firm will continue to serve as counsel for the aforementioned Plaintiff in the instant action.

Submitted simultaneously with the filing of this motion is tender of the required \$75.00 fee to the Clerk of this Court. In support of this motion, a Request for Admission *Pro Hac Vice* has been attached and marked as Exhibit "A."

The granting of this motion and admission of Elizabeth Claire Xidis to serve as co-counsel for the aforementioned Plaintiff will cause no delay in this action and will not cause any opposing party to suffer prejudice or hardship. Movant believes that Elizabeth Claire Xidis is eligible for admission to the Bar of this Court, and Movant respectfully requests that the Court exercise its discretion to admit Elizabeth Claire Xidis *pro hac vice*.

A proposed order accompanies this motion.

Respectfully Submitted,

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Attorneys for the State of Oklahoma

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of December, 2006, I electronically transmitted the attached document to the following:

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I hereby certify that on this 5th day of December, 2006, I served the foregoing document by U.S. Postal Service on the following:

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State of Oklahoma
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Watts, OK 74964

/s/ Richard T. Garren

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

1. STATE OF OKLAHOMA, ex rel.)
W.A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL OF)
THE STATE OF OKLAHOMA and)
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Defendants.)

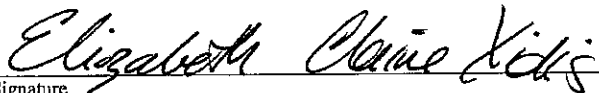
REQUEST FOR ADMISSION PRO HAC VICE
(to be attached to Motion for Admission Pro Hac Vice)

I hereby request admission to the Bar of this Court PRO HAC VICE in support of which I represent that the answers to the following questions are complete, true, and correct:

1. Full Name: ELIZABETH CLAIRE XIDIS.
2. State bar membership number: See Number 4 below.
3. Business address, telephone and fax numbers:

Motley Rice LLC
28 Bridgeside Boulevard
Mt. Pleasant, South Carolina 29465
(843) 216-9251 - Voice
(843) 216-9450 - Facsimile

4. List all state and federal courts or bar associations in which you are a member "in good standing" to practice law:
- a) I was admitted to the South Carolina State Bar in 2002. My South Carolina State Bar Number is 70484.
 - b) I was admitted to the New York State Bar in 2002. My New York State Bar Number is 582984.
 - c) I was admitted to the District of Columbia Bar in 2002. My District of Columbia State Bar Number is 484256.
 - d) I was admitted to the West Virginia State Bar in 2004. My West Virginia State Bar Number is 9756.
 - e) I was admitted to practice law in the District Court for the Southern District of West Virginia in 2004.
 - f) I was admitted to practice law in the Supreme Court of Appeals of West Virginia in 2004.
 - g) I was admitted to practice law in the US District Court, District of South Carolina in 2003. My US District Court, District of South Carolina ID Number is 8002.
5. Have you been denied admission, disbarred, suspended from practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee or administrative body? **NO.**
6. Have any proceedings which could lead to any such disciplinary action been instituted against you in any such bodies? **NO.**
- (Please attach a statement explaining any "Yes" answers to questions 5 or 6.)
7. Are you familiar with the Federal Rules of Evidence, the Federal Rules of Civil or Criminal Procedure (as applicable to this case) and the local rules of this court? **YES.**


 Signature
 ELIZABETH CLAIRE XIDIS (See Number 4 above)
 Printed Name Bar Number
 MOTLEY RICE LLC
 Firm Name
 28 BRIDGESIDE BLVD., P.O. BOX 1792
 Address
 MT. PLEASANT SC 29465
 City State ZIP
 TEL. NO.: (843) 216-9251 FAX NO.: (843) 216-9450
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 cxidis@motleyrice.com
 Email Address



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that


ELIZABETH CLAIRE XIDIS

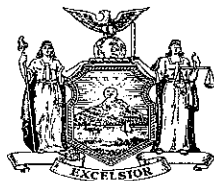
was on the 8TH day of DECEMBER, 2003

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on October 25, 2006.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk



State of New York
Supreme Court, Appellate Division
Third Judicial Department

I, Michael J. Novack, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Elizabeth Claire Xidis

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 30th day of January, 2002, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 20th day of October, 2006.



Michael J. Novack

Clerk

The Supreme Court of South Carolina

Certificate of Good Standing

I, Daniel E. Shearouse, Clerk of the Supreme Court of South Carolina, do hereby certify that Claire Xidis was duly sworn and admitted as an attorney in this state on May 15, 2002, and is currently an active member of the South Carolina Bar.

DANIEL E. SHEAROUSE, CLERK

BY Gayle B. Watts
DEPUTY CLERK FOR BAR ADMISSIONS

Columbia, South Carolina

October 30, 2006

AO 136
(Rev. 6/82)

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA
DISTRICT OF SOUTH CAROLINA

I, Larry W. Propes, Clerk of the United States District Court, District of
South Carolina,

DO HEREBY CERTIFY That Elizabeth Claire Xidis, ID# 8002, was duly
admitted to practice in said Court on August 8, 2002, and is in good standing as a
member of the bar of said Court.

Dated at Charleston, South Carolina
on October 31, 2006.

Larry W. Propes, Clerk

By Melissa Newman
Deputy Clerk

THE WEST VIRGINIA STATE BAR

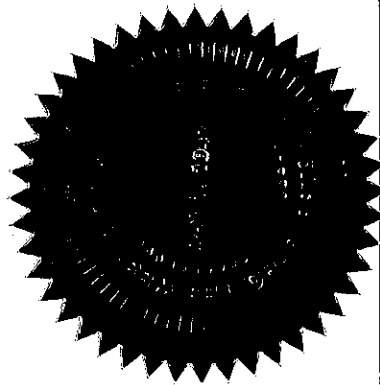
Certificate of Good Standing

Elizabeth Claire Xidis - WWSB ID#9756

This is to certify that, according to the records of the West Virginia State Bar, Elizabeth Claire Xidis, of Mount Pleasant, SC, was admitted to practice law by the West Virginia Supreme Court of Appeals on October 22, 2004, and was registered as an active member of The West Virginia State Bar in October, 2004.

It is further certified that the said Elizabeth Claire Xidis, according to our membership records, is currently an active member in good standing with The West Virginia State Bar.

Given over my hand and seal of The West Virginia State Bar this day, October 25, 2006.



A handwritten signature in cursive script, reading "Cheryl L. Wright".

Cheryl L. Wright
Membership Coordinator
The West Virginia State Bar

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

I ss.

SOUTHERN DISTRICT OF WEST VIRGINIA

I,

Teresa L. Deppner,
District Court for the Southern District of West Virginia

Clerk of the United States

DO HEREBY CERTIFY THAT

Elizabeth Claire Xidis was

duly admitted to practice in said Court on
of the bar of said Court.

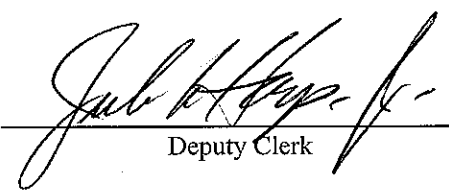
October 22, 2004 and is in good standing as a member

Dated at Charleston

Teresa L. Deppner

Clerk

on November 14, 2006

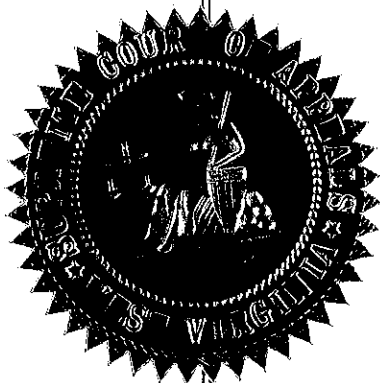


Deputy Clerk

STATE OF WEST VIRGINIA

I, Edythe A. Nash, Deputy Clerk of the Supreme Court of Appeals of West Virginia, hereby do certify that Elizabeth Claire Xidis, of Mount Pleasant, South Carolina, an attorney duly licensed to practice law in this State, was admitted to practice law before the Supreme Court of Appeals of West Virginia, the highest court of the State, on the 22nd day of October, 2004, that she is an attorney in good standing in said Court and is currently on active status and that her private and professional characters are good.

Given under my hand and seal of said Court, at Charleston, West Virginia, this 20th day of October, 2006, and in the 144th year of the State.



Edythe A. Nash
Deputy Clerk, Supreme Court of Appeals of West Virginia